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Attorneys for Defendants
AMAZON.COM, INC., GOLDEN STATE
FC, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DAVID PARSON and BRANDON
MITCHELL, individually and on behalf of all
those similarly situated, and MARIAH
GULLAT as an individual,

Plaintiffs,

vs.

GOLDEN STATE FC LLC, AMAZON.COM,
INC., TRUEBLUE INC, SMX, and DOES 1
through 25, inclusive,

Defendants.

Case No.: 3:16-cv-00405-JST

STIPULATION TO DISMISS COMPLAINT
WITH PREJUDICE and ~~Proposed~~ ORDER

Judge: Honorable Jon S. Tigar

STIPULATION

Following informal discovery, the parties, by and through their attorneys of record, hereby stipulate to the following:

WHEREAS, after informal discovery, including Plaintiffs' counsel's visit to the fulfillment center in which Plaintiffs currently work or formerly worked, Plaintiffs have decided to withdraw this action.

ACCORDINGLY, IT IS HEREBY STIPULATED AND REQUESTED by and between the parties in this action that:

1. All of Plaintiffs' claims in this matter be dismissed with prejudice and without costs and attorneys' fees to any party;
2. Plaintiffs agree not to assert claims in the future that are based on the specific factual allegations raised in the Complaint and/or First Amended Complaint in this matter; and
3. Notwithstanding the foregoing, Plaintiffs are not precluded from recovering from or participating in other class action cases that are certified as absent class members, but not as named plaintiffs or class representatives. This includes but is not limited to any recovery associated with MDL Docket No. 2504, Master File 3:14-md-2504, Case No. 3:14-cv-290-DJH (*Saldana et al v Amazon.com et al.*)

IT IS SO STIPULATED:

Dated: June 27, 2016

CLAYEO C. ARNOLD, APC

By: /s/ Joshua H. Watson
JOSHUA H. WATSON
Attorneys for Plaintiffs David Parson;
Branden Mitchell; Mariah Gullat

Dated: June 27, 2016

Dated: June 27, 2016

ONGARO, PC

By: /s/ David R. Ongaro
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CARA R. SHERMAN
Attorneys for Defendants Trueblue, Inc. &
SMX, LLC

MORGAN, LEWIS & BOCKIUS, LLP

By: /s/ Theresa Mak
THERESA MAK
Attorneys for Defendants Amazon.com Inc.,
Golden State Fulfillment FC LLC

ORDER

Pursuant to and subject to the terms and conditions of the forgoing stipulation, this matter is hereby DISMISSED WITH PREJUDICE and without costs and attorneys' fees to any party.

IT IS SO ORDERED.

Dated: June 29, 2016


HONORABLE J. S. TIGAR